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10 George Suarez

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 GEORGE SUAREZ,

17 Defendant.

Case no.18-cr-00390-RFB-BNW-5

STIPULATION TO CONTINUE
SENTENCING

(Third Request)¹

18 IT IS HEREBY STIPULATED AND AGREED, by and between United States
19 of America, by and through Nicholas A. TRUTANICH, United States Attorney, and Allison
20 Reese, Assistant United States Attorney, and Patricia M. Erickson, counsel for defendant
21 George Suarez that the sentencing hearing currently scheduled for December 20, 2019 at
22 10:00 A.M. be vacated and set to a date and time convenient to this Honorable Court
23 during the month of January, 2020.

24 This stipulation is entered into for the following reasons:

- 25 1. A significant breakdown in communication has occurred between Mr.
26 Suarez and his retained counsel, Vitaly B. Sigal.

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¹ On December 5, 2019, the sentencing was continued to December 19, 2019. Subsequently, at the request of the parties, the sentencing hearing was continued by one day to December 20, 2019. Consequently, this motion requests a third continuance of the sentencing date.

- 1 2. Based on this breakdown in communication, Mr. Suarez has
2 requested Patricia M. Erickson become his primary retained counsel
3 and appear with him on the sentencing date.²
4 3. Ms. Erickson will be out of the jurisdiction between December 18 and
5 December 22, 2019.
6 4. Given the fact that Mr. Suarez believed he would be sentenced on
7 December 5, 2019, he made plans to be with his family members
8 during the upcoming holidays.
9 5. The parties agree to the requested continuance.
10 6. Additionally, denial of this request for continuance could result in a
11 miscarriage of justice.
12 7. The additional time requested by this Stipulation is made in good faith
13 and not for purposes of delay.

14 This is the first written request for a continuance but the third request based upon
15 proceedings in court.

16 Dated this 9th day of December, 2019.

17 NICHOLAS TRUTANICH
18 UNITED STATES ATTORNEY

19 /s/ Allison Reese
20 Allison Reese
21 Assistant U.S. Attorney

 /s/ Patricia M. Erickson
 Patricia M. Erickson
 Counsel for Defendant George Suarez

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27 ² While Patricia M. Erickson is already listed as counsel in the case at
28 bar, out of an abundance of caution, she is simultaneously e-filing the Designation of
Retained Counsel.

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEVADA

4 UNITED STATES OF AMERICA,)

5 Plaintiff,)

6 vs.)

7 GEORGE SUAREZ,)

8 Defendant.)
9

Case no.18-cr-00390-RFB-BNW-5

ORDER

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11 Based on the Stipulation of the parties, this Court finds that the ends of
12 justice are served by granting the requested continuance which outweighs the best interest
13 of the public and the Defendant in a speedy sentencing since failure to grant the
14 continuance would be likely to result in a miscarriage of justice and would deny the parties
15 herein sufficient time and the opportunity within which to be able to effectively and
16 thoroughly prepare for the sentencing, taking into account the exercise of due diligence.

17 IT IS THEREFORE ORDERED that the sentencing in the above-captioned
18 matter currently scheduled for December 20, 2019 at 10:00 AM be vacated and continued
19 to Wednesday, January 8, 2020 at 2:15 p.m.

20 Dated this 10th day of December, 2019

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23 RICHARD F. BOULWARE, II
24 UNITED STATES DISTRICT JUDGE
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